

Your Ref N/A
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May 22, 2018

By CM/ECF

Magistrate Judge Cathy L. Waldor
United States District Court, District of New Jersey
Martin Luther King Jr. Courthouse
50 Walnut St.
Room 4040, Courtroom 4C
Newark, NJ 07101

Re: *Arzadi, et al. v. Evanston Insurance Company, et al.*
Case No. 2:17-cv-05470

Dear Magistrate Judge Waldor:

We represent Defendant Evanston Insurance Company (“Evanston”) in the above-referenced matter. As you may recall, the parties participated in a conference before the Court on May 16, 2018, wherein Your Honor directed that: (1) the examination under oath of Plaintiff Karim Arzadi be conducted on or before June 6, 2018; and (2) the Plaintiffs provide to Evanston the long-overdue defense counsel information that Evanston has requested from Plaintiffs on or before May 18, 2018. The Court then scheduled a June 6, 2018 conference call to determine whether its directives have been complied with.

At the close of the conference, Your Honor also directed Evanston to advise the Court if the Plaintiffs did not provide the defense counsel information by the May 18th Court-Ordered deadline. This is to respectfully inform the Court that as of today, Plaintiffs have still not provided Evanston with the long-overdue defense counsel information that it is entitled to receive. As such, Evanston respectfully requests Court intervention on this issue.

Plaintiffs have now filed a Motion Seeking a Protective Order to prevent Mr. Arzadi from submitting to the already Court-Ordered examination under oath and to stay the proceedings in this matter. This motion seeks to revisit an issue that this Court already resolved and ruled on. The Plaintiffs’ motion is a clear signal that it has no intention to comply with the Court’s prior directives. As such, Evanston requests that a conference call be scheduled with the Court at its earliest convenience to discuss this issue so that Evanston may avoid incurring unnecessary motion expenses on this already decided matter.

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Magistrate Judge Cathy L. Waldor

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We thank the Court for its time and consideration.

Respectfully yours,

s/ Christina R. Salem

Christina R. Salem